

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SERGIO CALDERON LARA, JESUS  
MISARAY, BERNARDO SEGURA LARA,  
and JORGE GRANADOS,  
*individually and on behalf of others similarly  
situated,*

*Plaintiff,*

-against-

KNOLLWOOD ROAD DELICATESSEN  
INC. (D/B/A KNOLLWOOD GOURMET  
DELI), JOHN DOE CORP. (D/B/A G&J  
DELI), GERARD FLETCHER, TIMOTHY  
FLETCHER, GAMEL C. SALEH (A.K.A  
MOE) and KARMEN DOE,

**Case: 19-cv-9996-AJN**

**AFFIRMATION OF  
CLELA ERRINGTON IN  
SUPPORT OF CERTIFICATES  
OF DEFAULT**

-----X  
Clela Errington, an attorney duly admitted to practice in New York and in this court,  
declares on penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am one of the attorneys for Plaintiffs in this lawsuit for unpaid wages under the FLSA and New York Labor Law and regulations.
2. I submit this affirmation in support of the Plaintiffs' application for certificates of default pursuant to Fed. R. Civ. P. 55(a) and Local Rule 55.1, against the Defendants Knollwood Road Delicatessen, Inc., Gamel C. Saleh, Karmen Doe, and Timothy Fletcher, for failure to respond to the Complaint or otherwise appear in this action.
3. The Complaint in this action was filed on October 29, 2019. *See* Civil Docket Sheet Entry 1.
4. A summons and copy of the Complaint was properly served on Knollwood Road Delicatessen Inc. on November 27, 2019. *See* Civil Docket Sheet Entry 16.
5. A summons and copy of the Complaint was properly served on Gamel C. Saleh on December 13, 2019. *See* Civil Docket Sheet Entry 17.
6. A summons and copy of the Complaint was properly served on Karmen Doe on December 13, 2019. *See* Civil Docket Sheet Entry 18.

7. A summons and copy of the Complaint was properly served on Timothy Fletcher on December 13, 2019. *See* Civil Docket Sheet Entry 19.

8. On information and belief, individual Defendant Knollwood Road Delicatessen, Inc., being a corporation organized and existing under the laws of the State of New York, and individual defendants Timothy Fletcher, Gamel C. Saleh, and Karmen Doe, are not infants, nor in the military, nor incompetent persons.

9. The deadline for Defendant Knollwood Road Delicatessen, Inc. to answer or otherwise respond to the Complaint was December 18, 2019. The deadline for Defendants Gamel C. Saleh, Karmen Doe, and Timothy Fletcher to answer or otherwise respond to the Complaint was January 3, 2020. Said Defendants have failed to appear, plead, or otherwise defend the action.

10. Wherefore, Plaintiffs respectfully request that the Court enter a default judgment against Defendants Knollwood Road Delicatessen Inc., Gamel C. Saleh, Karmen Doe, and Timothy Fletcher.

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
March 13, 2020

/s/ Clela Errington  
Clela Errington, Esq.  
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